

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

TERRY PARHAM,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO.
	)	2:06-CV-483-WHA
RANDY ALLEN, an individual, MACK	)	
TRUCKS, INC., a corporation, et al.,	)	
	)	
Defendants.	)	
	)	

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REPORT OF THE PARTIES' PLANNING MEETING

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Pursuant to Fed. R. Civ. P. 26(f), and this Court's Order of June 28, 2006, counsel for the parties have conferred on a discovery plan and jointly submit this Report of the Parties' Planning Meeting.

1. The meeting of the parties was held on July 12, 2006. The meeting was attended by:

Christopher Glover	Brett Ross
Hollis & Wright	Carr Allison
<b>Counsel for Plaintiff</b>	<b>Counsel for Randy Allen</b>

John Morrow  
Geoffrey Bald  
Burr & Forman LLP  
**Counsel for Mack Trucks, Inc.**

2. **Pre-Discovery Disclosures.** The parties will exchange the information required by Federal Rule of Civil Procedure 26(a)(1) on or before August 15, 2006.

3. **Discovery Plan.** The parties jointly propose to the Court the following discovery plan:

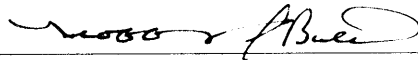
- a. Discovery will be needed on the following subject(s):  
All claims by Plaintiff and all defenses by Defendants.
- b. All Discovery commenced in time to be completed by March 31, 2007.
- c. Maximum of 40 interrogatories by each party to any other party.  
Responses due **30** days after service.
- d. Maximum of **40** requests for production by each party to any other party.  
Responses due **30** days after service.
- e. Maximum of **40** requests for admission by each party to any other party.  
Responses due **30** days after service.
- f. Each party shall be allowed to take a maximum of 7 depositions.
- g. Reports from retained experts under Rule 26(a)(2) due:  
  
from Plaintiff by December 31, 2006  
Plaintiffs' experts to be made available for deposition on or before  
January 31, 2007  
  
from Defendants by February 28, 2007  
Defendants' experts to be made available for deposition on or before  
March 31, 2007.
- h. Supplementations under Rule 26(e) due no later than 30 days before the close of discovery.

4. **OTHER ITEMS**

- a. The parties do not request a conference with the Court before entry of the scheduling order.
- b. The parties request a pretrial conference in June 2007.
- c. Plaintiff should be allowed until September 30, 2006, to join additional parties and to amend the pleadings.

- d. Defendant should be allowed until October 31, 2006, to join additional parties and to amend the pleadings.
- e. All potentially dispositive motions should be filed by April 2, 2007.
- f. Settlement cannot be realistically evaluated prior to some discovery and may be enhanced by use of mediation to be determined at a later date.
- g. Final lists of trial evidence under Rule 26(a)(3) should be due pursuant to the terms of the pretrial order.
- h. Parties should have **14** days after service of final lists of trial evidence to list objections under Rule 26(a)(3).
- i. The case should be ready for trial on the Court's July 9, 2007, docket, and at this time is expected to take approximately four to five (4-5) days.

Respectfully submitted,



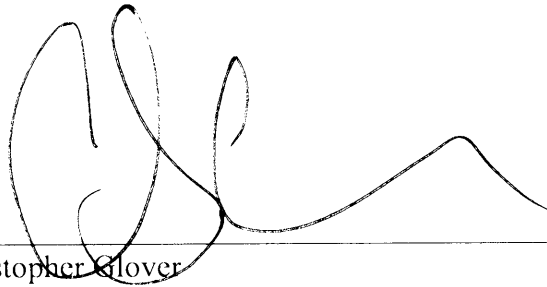
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John C. Morrow ASB-9424-077J  
Geoffrey S. Bald ASB-0768-D46G

Attorneys for Defendants  
MACK TRUCKS, INC.

**OF COUNSEL:**

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Christopher Glover

Attorney for Plaintiff

**OF COUNSEL:**

HOLLIS & WRIGHT, P.C.  
1750 Financial Center  
505 North 20<sup>th</sup> Street  
Birmingham, Alabama 353203

A handwritten signature in black ink, appearing to read "Brett Ross", written over a horizontal line.

Brett Ross

Attorney for Defendant  
Randy Allen

**OF COUNSEL:**

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